

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE:
PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*
Plaintiffs,

CIVIL ACTION NO: 14-cv-0029

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,
Defendants.

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF
DOUGLAS M. BURNS**

DOUGLAS M. BURNS declares pursuant to 28 U.S.C. § 1746:

1. I am an associate at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP ("Paul, Weiss"), counsel to Defendants National Football League and NFL Properties LLC (collectively, the "NFL Parties") in MDL No. 2323. I respectfully submit this declaration in support of the National Football League's and NFL Properties LLC's Memorandum of Law in Support of Final Approval of the Class Action Settlement Agreement and in Response to Objections.

2. Attached as Exhibit 1 is a true and correct copy of the Claims Administrator Update as of Nov. 9, 2014.

3. Attached as Exhibit 2 is a true and correct copy of Ken Belson & Bill Pennington, *Former N.F.L. Players Face Deadline to Opt Out of Concussion Settlement*, N.Y. Times, Oct. 14, 2014.

4. Attached as Exhibit 3 is a true and correct copy of Ken Belson, *For Retirees, Decision on Concussion Settlement Will Not Be a Simple One*, N.Y. Times, July 22, 2014.

5. Attached as Exhibit 4 is a true and correct copy of Sam Farmer, *Revised NFL Concussion Settlement Gets U.S. Judge's Preliminary OK*, L.A. Times, July 7, 2014.

6. Attached as Exhibit 5 is a true and correct copy of Ken Belson, *N.F.L. Agrees to Settle Concussion Suit for \$765 Million*, N.Y. Times, Aug. 29, 2013.

7. Attached as Exhibit 6 is a true and correct copy of Christopher Randolph, Stella Karantzoulis & Kevin Guskiewicz, *Prevalence and Characterization of Mild Cognitive Impairment in Retired National Football League Players*, 19 J. Int'l Neuropsychological Soc'y 873 (2013).

8. Attached as Exhibit 7 is a true and correct copy of Paul McCrory et al., *Consensus Statement on Concussion in Sport: The 4th International Conference on Concussion in Sport Held in Zurich, November 2012*, 47 Brit. J. Sports Med. 250 (2013).

9. Attached as Exhibit 8 is a true and correct copy of Nat'l Insts. of Health, *Report on the Neuropathology of Chronic Traumatic Encephalopathy Workshop* (2012).

10. Attached as Exhibit 9 is a true and correct copy of Inst. of Med. of the Nat'l Acads., *Sports-Related Concussions in Youth: Improving the Science, Changing the Culture* (2013).

11. Attached as Exhibit 10 is a true and correct copy of Rummana Hussain, *Hoge Wins Lawsuit Against Doctor*, Chi. Trib., July 22, 2000.

12. Attached as Exhibit 11 is a true and correct copy of Ann C. McKee et al., *The Spectrum of Disease in Chronic Traumatic Encephalopathy*, 136 Brain 43 (2013).

13. Attached as Exhibit 12 is a true and correct copy of Grant L. Iverson, *Chronic Traumatic Encephalopathy and Risk of Suicide in Former Athletes*, 48 Brit. J. Sports Med. 162 (2014).

14. Attached as Exhibit 13 is a true and correct copy of Lauren K. Wolf, *Racing to Detect Brain Trauma*, 92 Chem. & Eng'g News 9 (2014).

15. Attached as Exhibit 14 is a true and correct copy of Jesse Mez, Robert A. Stern & Ann C. McKee, *Chronic Traumatic Encephalopathy: Where Are We and Where Are We Going?*, 13 Current Neurology & Neuroscience Rep. 407 (2013).

16. Attached as Exhibit 15 is a true and correct copy of Andrew Gardner et al., *Chronic Traumatic Encephalopathy in Sport: A Systematic Review*, 48 Brit. J. Sports Med. 84 (2014).

17. Attached as Exhibit 16 is a true and correct copy of C.C.H. Pflieger et al., *Head Injury Is Not a Risk Factor for Multiple Sclerosis: A Prospective Cohort Study*, 15 Multiple Sclerosis 294 (2009).

18. Attached as Exhibit 17 is a true and correct copy of M.J. Goldacre et al., *Risk of Multiple Sclerosis After Head Injury: Record Linkage Study*, 77 J. Neurology, Neurosurgery & Psychiatry 351 (2006).

19. Attached as Exhibit 18 is a true and correct copy of John F. Annegers et al., *A Population-Based Study of Seizures After Traumatic Brain Injuries*, 338 New Eng. J. Med. 20 (1998).

20. Attached as Exhibit 19 is a true and correct copy of Jacob S. Elkins et al., *Pre-existing Hypertension and the Impact of Stroke on Cognitive Function*, 58 Annals Neurology 68 (2005).

21. Attached as Exhibit 20 is a true and correct copy of Ramesh Sahathevan et al., *Dementia, Stroke and Vascular Risk Factors; a Review*, 7 Int'l J. Stroke 61 (2012).

22. Attached as Exhibit 21 is a true and correct copy of Yi-Hua Chen et al., *Patients with Traumatic Brain Injury: Population-Based Study Suggests Increased Risk of Stroke*, 42 Stroke 2733 (2011).

23. Attached as Exhibit 22 is a true and correct copy of Chien-Chang Liao et al., *Stroke Risk and Outcomes in Patients with Traumatic Brain Injury: 2 Nationwide Studies*, 89 Mayo Clinic Proc. 163 (2014).

24. Attached as Exhibit 23 is a true and correct copy of Chia-Hsuin Chang et al., *Increased Risk of Stroke Associated with Nonsteroidal Anti-Inflammatory Drugs: A Nationwide Case-Crossover Study*, 41 Stroke 1884 (2010).

25. Attached as Exhibit 24 is a true and correct copy of Amy Borenstein Graves et al., *The Association Between Head Trauma and Alzheimer's Disease*, 131 Am J. Epidemiology 491 (1990).

26. Attached as Exhibit 25 is a true and correct copy of Yi-Kung Lee et al., *Increased Risk of Dementia in Patients with Mild Traumatic Brain Injury: A Nationwide Cohort Study*, 8 PLOS ONE 1 (2013).

27. Attached as Exhibit 26 is a true and correct copy of M. Anne Harris et al., *Head Injuries and Parkinson's Disease in a Case-Control Study*, 70 Occupational & Env'tl. Med. 839 (2013).

28. Attached as Exhibit 27 is a true and correct copy of Brandon E. Gavett, Robert A. Stern & Ann C. McKee, *Chronic Traumatic Encephalopathy: A Potential Late Effect of Sport-Related Concussive and Subconcussive Head Trauma*, 30 Clinical J. Sports Med. 179 (2011).

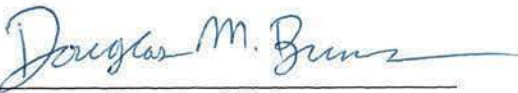
29. Attached as Exhibit 28 is a true and correct copy of Erik Brady, *Q&A: Robert Stern Sheds Light on BU Brain Study*, USA Today, Mar. 8, 2011.

30. Attached as Exhibit 29 is a true and correct copy of Letter from Brad. S Karp to William N. Sinclair, dated October 2, 2014.

31. Attached as Exhibit 30 is a true and correct copy of Richard Sandomir, *ESPN Extends Deal with N.F.L. for \$15 Billion*, N.Y. Times, Sept. 8, 2011.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
November 12, 2014



Douglas M. Burns